



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
DENVER REGIONAL OFFICE  
BYRON G. ROGERS FEDERAL BUILDING  
1961 STOUT STREET, SUITE 1700  
DENVER, COLORADO 80294-1961

DIVISION OF  
ENFORCEMENT

March 10, 2023

**VIA ECF**

The Honorable Victor Marrero  
United States District Court, Southern District of New York  
United States Courthouse  
500 Pearl St.  
New York, NY 10007  
[ChambersNYSDMarrero@nysd.uscourts.gov](mailto:ChambersNYSDMarrero@nysd.uscourts.gov)

Re: Securities and Exchange Commission v. David Stone et al., 22-cv-3553

Dear Judge Marrero:

Pursuant to our notification obligations under the May 24, 2022 Stipulated Order Relating to Defendant John Robson and Relief Defendant Brett Adams (Doc. No. 47), the SEC writes to notify the Court that, with the SEC's consent, Mr. Robson may withdraw from profits he has represented that he is legally entitled to take from Western Water Work LLC, Adams Grain Bins, LLC, Clemons Sales Corporation, and Good Company, LLC, (collectively "the Companies") an additional \$3,000 per month (than previously allowed) for his monthly living expenses. *See* Doc. No. 47 at 5 ("[C]ounsel for the SEC shall have authority to authorize, in writing, the release of additional funds to Robson or Adams, including the distribution of funds from the Companies to which Robson or Adams would be otherwise legally entitled, for their reasonable legal expenses or living expenses, should it deem fit to do so in its sole discretion, without further order of the Court. By letter, counsel for the SEC shall notify the Court of any such agreement for the receipt of additional funds.").

In addition, with the SEC's consent, Mr. Robson may withdraw from profits he has represented that he is legally entitled to take from the Companies amounts to cover certain one-time expenditures, consisting of the following: (1) up to \$15,000 for hospital expenses associated with the birth of his son; (2) up to \$4,000 for legal fees associated with a guardianship litigation; and (3) up to \$10,000 for certain therapy-related expenses. If, after paying any of these expenses, Mr. Robson receives reimbursement or return of any amounts paid ("Reimbursed Funds"), he may use the Reimbursed Funds for his general living expenses; provided, however, that the amount Mr. Robson is entitled to withdraw for monthly living expenses shall be reduced by the amount of any Reimbursed Funds received the previous month.

Regards,

s/: Christopher E. Martin  
Christopher E. Martin  
SEC Senior Trial Counsel